

December 16, 2002

Mark Hanneman
Sierra Pacific Power Company
PO Box 10100
Reno, NV 89520-0024

Facility: Reid Gardner Station
Moapa, NV
Facility ID: H-000530

Reference: *Corrective Action Plan for Ponds D and E, Nevada Power Company, Reid Gardner Generating Station, Moapa, Nevada* (dated November 11, 2002).

Dear Mr. Hanneman:

The Nevada Division of Environmental Protection (NDEP) has received and reviewed the referenced Corrective Action Plan (CAP) submitted by Nevada Power Company (NPC). The CAP proposes a remediation system for Ponds D and E at Reid Gardner Station, Moapa, NV consisting of a gravity-flow drain system. Six inch PVC perforated piping terminating into sumps is proposed for the construction of the drain system. The groundwater collected in the sumps will be pumped into Pond E.

The proposed location for the drain piping is on the interior side of the perimeter berms along the south side of Pond D and along the south and southeast sides of Pond E. The vertical location of the drain piping is proposed at just below the water table as determined by perimeter well measurements taken on May 15, 2002. Sump pumps will be installed and operated on a continual schedule. The proposed reasons for discontinuing pump operation are if the sumps are dry, if pumped water meets approved remediation goals, or if pond capacity cannot support the additional inflow. Biannual sampling of sumps is proposed to monitor for system effectiveness.

Remediation goals were proposed as follows. The drains are to be pumped as capacity allows until Total Dissolved Solids (TDS) concentration in the sumps approaches "background" concentration or if the conditions of NAC 445A.22745 can be demonstrated. Background concentration was stated to be in the range of 4,500 mg/L.

The NDEP concurs with the proposed remedial approach detailed in the November 11, 2002 CAP submitted by NPC with the following exceptions, changes, and/or conditions:

- **Please consider placing the drain piping approximately 2 feet below the historical low-point groundwater elevation measurement from the perimeter wells. In addition, consider continually pumping to promote flow through the system. The NDEP believes that an active remediation system is required for this area; therefore, the drain system should not rely on gravity flow.**
- **Adequate pond capacity should be made available by including any additional inflow generated by the drain system into the water balance for plant operations.**
- **Sampling of the sumps should be conducted on a quarterly schedule to monitor system effectiveness.**

The analytes to measure groundwater quality and the remediation standards for these analytes will be evaluated and discussed in the near future. NPC will need to work with the NDEP to determine background concentration values for these individual analytes. In the interim, please continue groundwater monitoring and sampling of all wells and analytes as detailed in Administrative Order # NV052797W1 and conduct the same analyses of pond water samples collected from each sump on a quarterly basis.

Additionally, the NDEP recognizes that this remedial activity is proposed in conjunction with on-going construction and relining of Pond E and closure of Pond D. As such, the NDEP views the proposed remedial activities as an opportunity to initiate remediation of impacted groundwater present beneath and adjacent to a portion of Ponds D and E. NPC should recognize that additional corrective action measures will be requested at other impacted areas of the Reid Gardner Generating Station Site and may also be requested regarding the area beneath and adjacent to Ponds D and E.

Note: Water discharges, withdrawals and re-injections, and air emissions will require different state and local government permits. Coordination should be initiated immediately to determine which permits and approvals are required or may require revision as a consequence of changes to corrective actions and/or remedial design. This information is best obtained from each agency of government, including state and local fire, health, public works, sanitation, transportation, building/construction, NDEP, and Nevada Division of Water Resources.

We trust this letter meets your needs at this time. Please contact the undersigned if you have any questions concerning this letter at (702) 486-8267 or sharbour@ndep.state.nv.us.

Sincerely,

Shannon Harbour, EI
Staff Engineer
Remediation and LUST Branch
Bureau of Corrective Actions, NDEP

Mark Hanneman
Sierra Pacific Power Company
Re: Reid Gardner Station
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